

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America)

v.)

Adrian Martinez Jr.)

YOB: 2000 Citizenship: United States)

Case No. M-20-1563-M)

United States District Court
Southern District of Texas
FILED

Defendant(s)

AUG 17 2020

CRIMINAL COMPLAINT

David J. Bradley, Clerk

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 17, 2020 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC 841

Defendant did knowingly and intentionally possess with the intent to distribute
 and knowingly and intentionally import into the United States approximately
 9.52 kilograms of methamphetamine.

21 USC 952

This criminal complaint is based on these facts:

See Attachment A.

☒ Continued on the attached sheet.

/s/ Edgard Reynoso

Complainant's signature

Complaint Approved by AUSA Frances Blake

Edgard Reynoso, HSI, Task Force Officer

Printed name and title

Submitted by reliable electronic means, sworn to and
 attested to telephonically per Fed. R. Cr. P. 4.1, and
 probable cause found on:

Date:

8/17/20 - 4:27 p.m.

Judge's signature

City and state:

McAllen, Texas

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

Attachment A

I, Edgard Reynoso, am a Task Force Officer with United States Homeland Security Investigations ("HSI") and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause.

On August 17, 2020, HSI received information from Customs and Border Protection ("CBP"), Office of Field Operations at the Hidalgo Port of Entry, in Hidalgo, Texas, regarding the seizure of approximately 9.52 kilograms of crystal methamphetamine.

On August 17, 2020, the defendant, later identified as Adrian MARTINEZ Jr., attempted to make entry into the United States from Mexico at the Hidalgo, Texas Port of Entry. MARTINEZ arrived in a white 1999 Ford Ranger in the vehicle inspection lane and presented himself for inspection to CBP officers. MARTINEZ was the registered owner, driver, and sole-occupant of the vehicle. During inspection MARTINEZ displayed nervous behavior.

A CBP officer referred MARTINEZ for secondary inspection. At secondary inspection, a CBP K-9 officer and his assigned narcotics canine inspected the Ford Ranger and the canine indicated a positive alert to the area of the spare tire. The Ford Ranger was sent for an x-ray inspection, where anomalies were identified in the area of the spare tire. CBP subsequently discovered a white crystalized substance in the spare tire, which field tested positive for the properties of methamphetamine.

HSI agents arrived on scene to assist with the investigation. During a post Miranda interview, MARTINEZ stated that approximately three months ago he was hired by an individual to smuggle currency from the United States to Mexico. MARTINEZ stated that he suspected that the individual he was working for was involved in narcotic smuggling. MARTINEZ stated that he was instructed to make false statements regarding his itinerary to inspecting officers to avoid inspection. MARTINEZ stated that he was instructed to contact the individual that hired him after he crossed into the United States for further instructions. MARTINEZ stated that he was aware that narcotics are smuggled from Mexico to the United States and that illicit currency is smuggled from the United States in Mexico.